

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

----- x  
:  
In re :: Chapter 9  
CITY OF DETROIT, MICHIGAN, :: Case No. 13-53846  
Debtor. :: Hon. Thomas J. Tucker  
----- x

**STIPULATION FOR ORDER WITHDRAWING**  
**DPLSA CLAIM #1878 as MOOT**

The City of Detroit, Michigan (“City”) and the Detroit Lieutenants and Sergeants Association (“DPLSA”), by and through their undersigned counsel, hereby stipulate to the entry of an Order Confirming that Claim No. 1878 is resolved by the DPLSA Collective Bargaining Agreement (“the DPLSA CBA”) and the City’s Confirmed Plan of Adjustment and Allowing Withdrawal of DPLSA Claim No. 1878, as Moot, in the form attached as Exhibit A. In support of their request, the City and the DPLSA state the following:

1. On February 20, 2014, the DPLSA filed Claim No. 1878.
2. Claim No. 1878 was filed during ongoing Court-ordered mediation between the City and the DPLSA in these Chapter 9 proceedings. Claim 1878 asserts DPLSA members’ right to recovery for certain pre-petition disciplinary actions (the “Pre-petition Discipline Matters”).

3. Among the Pre-petition Discipline Matters that are the subject of Claim No. 1878 are disciplinary actions dismissing Tonya Hughes, Donald Johnson and Victor Jones from the City of Detroit Police Department.
4. The parties agree that the Pre-petition Discipline Matter involving Tonya Hughes was rendered moot upon the issuance of a final and binding arbitration award, upholding the dismissal.
5. The parties agree that the Pre-petition Discipline Matter involving Donald Johnson was rendered moot upon notice of his filing for retirement
6. The parties agree that the Pre-petition Discipline Matter involving Victor Jones was rendered moot upon notice of his filing for retirement.
7. The City and the DPLSA, agree that (a) the Pre-petition Discipline Matters against Tonya Hughes, Donald Johnson and Victor Jones have been rendered moot; (b) Claim No. 1878 should be withdrawn as moot; and (c) as a result of the withdrawal of Claim No. 1878, the DPLSA and its affected members will have no right to receive any distribution in these bankruptcy proceedings based on Claim No. 1878.
8. The withdrawal of DPLSA Claim No. 1878 (and ostensibly Claim No. 3784 filed for notice purposes only) does not affect any rights that DPLSA has under any other pending claim.

WHEREFORE, the parties request the Court enter an Order in the form attached hereto as Exhibit A.

STIPULATED AND AGREED:

DPLSA ATTORNEYS

*/s/ Barbara A. Patek*  
Barbara A. Patek (P34666)  
Law Office of Barbara A Patek, PLC  
27 E Flint Street, Suite 2  
Lake Orion, MI 48362-3220  
p. (248) 814-9470  
f. (248-814-8231  
[pateklaw@gmail.com](mailto:pateklaw@gmail.com)

-and-

Peter Sudnick (P30768)  
Sudnick Law, PC.  
2555 Crooks Rd, Suite 150  
Troy, MI 48084  
(248) 643-8533

CITY OF DETROIT ATTORNEYS

*/s/ Mary Beth Cobbs*  
Mary Beth Cobbs (P40080)  
City of Detroit Law Department  
2 Woodward, Suite 500  
Detroit, MI 48226  
(313) 237-3075  
(313) 224-5505  
[cobbm@detroitmi.gov](mailto:cobbm@detroitmi.gov)

-and-

Letitia C. Jones (P52136)  
City of Detroit Law Department  
2 Woodward, Suite 500  
Detroit, MI 48226  
(313) 237-3002

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

----- X  
:  
In re :: Chapter 9  
CITY OF DETROIT, MICHIGAN, :: Case No. 13-53846  
Debtor. :: Hon. Thomas J. Tucker  
----- X

**ORDER WITHDRAWING  
DPLSA CLAIM #1878 AS MOOT**

This case is before the Court on the stipulation filed on \_\_\_\_\_ (Docket # \_\_\_\_\_, the Stipulation) entitled “Stipulation for Order Withdrawing DPLSA Claim #1878 as Moot.” Based on the Stipulation,

**IT IS ORDERED THAT** Claim No. 1878 filed on behalf of the Detroit Police Lieutenants and Sergeants Association is withdrawn as moot.

**Signed on:** \_\_\_\_\_

---

**Thomas J. Tucker  
U.S. Bankruptcy Court Judge**